

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Minnesota Chamber of Commerce, a  
Minnesota nonprofit corporation,

Civil No. 0:23-cv-02015 (ECT/JFD)  
Hon. Eric C. Tostrud

Plaintiff,

v.

John Choi, in his official capacity as  
County Attorney for Ramsey County,  
Minnesota; George Soule, in his official  
capacity as Chair of the Minnesota  
Campaign Finance and Public Disclosure  
Board; David Asp, in his official capacity  
as Vice Chair of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Carol Flynn, in her official capacity as  
Member of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Margaret Leppik, in her official capacity  
as Member of the Minnesota Campaign  
Finance and Public Disclosure Board;  
Stephen Swanson, in his official capacity  
as Member of the Minnesota Campaign  
Finance and Public Disclosure Board; and  
Faris Rashid, in his official capacity as  
Member of the Minnesota Campaign  
Finance and Public Disclosure Board,

Defendants.

---

**MOTION FOR LEAVE TO FILE AN *AMICUS* BRIEF  
BY CLEAN ELECTIONS MINNESOTA**

Clean Elections MN respectfully requests leave to participate as *amicus curiae* in the above-captioned matter, with respect to Defendants' motion for summary judgment.

Clean Elections MN, founded in 2017, is a non-partisan, non-profit organization that seeks an inclusive and healthy democracy for the state of Minnesota. In 2022, Clean

Elections MN became a leading advocate for changes to state law that would restrict the ability of foreign nationals to funnel money into our election system.

Although there is no particular statute or rule that contemplates the participation of *amicus curiae* at the district court level, district courts frequently exercise their inherent authority to allow their participation. *See, e.g., Mausolf v. Babbitt*, 158 F.R.D. 143, 148 (D. Minn. 1994); *see also North Dakota v. Heydinger*, 288 F.R.D. 423, 432 (D. Minn. 2012) (denying motion to intervene but permitting later motion for participation as *amicus curiae*). In *Mausolf*, the Court held that it was “satisfied [the proposed amici] has knowledge, experience, and a perspective ... which may assist the Court in its resolution of the issues raised by the parties in this case.” 158 F.R.D. at 148.

Clean Elections MN was one of the first local non-governmental organizations to advocate for closing the loophole in campaign finance law that allowed foreign-influenced corporations to funnel money into Minnesota elections and campaigns. When legislation was introduced in the Minnesota House of Representatives that would prohibit certain foreign-influenced corporations from contributing directly or indirectly to elections, the Board of Clean Elections MN voted to make this issue one of its top legislative priorities. Clean Elections MN ultimately was one of the only local non-governmental organizations to testify in support of the provision. Given its support of the legislation at question in this litigation, and its careful study of these issues, Clean Elections MN has a particular expertise and depth of knowledge regarding the constitutionality of the foreign-influenced corporations statute and proposed thresholds that will aid the Court in its resolution of the summary judgment motion.

For the foregoing reasons, Clean Elections Minnesota respectfully requests the Court grant its request to participate as *amicus curiae* in this matter, and permit Clean Elections Minnesota to file a brief of no more than 6,000 words on or before August 16, 2024, which is seven days after Defendants' brief in support of summary judgment is due, consistent with Federal Rule of Appellate Procedure 30(a)(6).

Dated: July 19, 2024

LOCKRIDGE GRINDAL NAUEN PLLP

s/Rachel A. Kitze Collins

Charles N. Nauen (#121216)

David J. Zoll (#0330681)

Rachel A. Kitze Collins (#0396555)

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401-2159

(612) 339-6900

[cnnauen@locklaw.com](mailto:cnnauen@locklaw.com)

[djzoll@locklaw.com](mailto:djzoll@locklaw.com)

[rakitzecollins@locklaw.com](mailto:rakitzecollins@locklaw.com)

FREE SPEECH FOR PEOPLE

Courtney Hostetler

John Bonifaz

Ben Clements

Amira Mattar

1320 Centre St. #405

Newton, MA 02459

(617) 249-3015

[chostetler@freespeechforpeople.org](mailto:chostetler@freespeechforpeople.org)

[jbbonifaz@freespeechforpeople.org](mailto:jbbonifaz@freespeechforpeople.org)

[bclements@freespeechforpeople.org](mailto:bclements@freespeechforpeople.org)

[amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)

***Counsel for Proposed-Amicus Curiae  
Clean Elections Minnesota***